

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

(1) JOSHUA FIELDS)
)
)
Plaintiff,)
)
v.) 21-cv-00986-G
)
(1) GREAT LAKES INSURANCE SE,) *Removed from the District Court of*
) *Kay County, State of*
(2) MJ KELLY COMPANY, and) *Oklahoma, Case No. CJ-2021-00037*
)
(3) CAPSTONE ISG,)
)
Defendants.)

**PLAINTIFF JOSHUA FIELDS' RESPONSES TO
DEFENDANT GREAT LAKES INSURANCE SE'S FIRST SET OF DISCOVERY**

COMES NOW the Plaintiff, Joshua Fields, in response to Defendant's interrogatories, hereby answers and states as follows:

GENERAL OBJECTION

This Plaintiff generally objects to Defendant's discovery requests to the extent they call for the identification of information that is not discoverable under applicable law, and identification of information in a manner not required by federal rules for discovery. Plaintiff further objects to Defendant's discovery requests to the extent that they call for the identification of information, which is privileged as the work product of this Plaintiff and its attorneys, and identification of attorney/client privileged communications. Without waiving such objections, this Plaintiff responds as follows:

INTERROGATORIES

INTERROGATORY NO. 1: Identify each person, exclusive of counsel, who provided, or assisted with formulating, any part of your answers to these Interrogatories, identifying in your answer which specific Interrogatory to which each person contributed.

ANSWER TO INTERROGATORY NO. 1: Plaintiff, Joshua Fields.

	2201 S. Fretz Ave., Ste. 110 Edmond, OK 73013 (405) 340-8034	May testify to his investigation of the incident and completion of the incident reports pertaining to the Plaintiff's subject incident.
12	Terry Nichols Tera Earp Kevin Wilson Catherine Aufderheide Ashley Eadle c/o Defense Counsel	Employees of Capstone Insurance. May testify about Capstone Insurance policy number HAR000525494, including but not limited to the purchase, issuance, changes and cancellation of the policy, and all other alterations to the policy during the effective dates of the policy. May also testify about payment of premiums on the policy, including the person or persons paying the premiums, how and when premiums were paid.
13	Russ Didlake KW Realtor 411 N. 14 th Street Ponca City, OK 74604 (580) 763-2760	May testify to his market analysis/appraisal on building. It is anticipated that this witness will give testimony that he agrees with Defendant's determination that the actual cash value, as defined by Defendant, for the covered property exceeded the limits of insurance on the applicable policy.
14	Phillip Noah Rimkus Consulting Group 2201 S. Fretz Ave., Ste. 110 Edmond, OK 73013 (405) 340-8034	Employee of Rimkus Consulting Group. May testify to his investigation of the incident and completion of the incident reports pertaining to the Plaintiff's subject incident.

INTERROGATORY NO. 3: Identify each and every person you expect to provide expert testimony at trial by providing the following information for each expert:

- (a) Educational background and work history;
- (b) all publications authored in the previous ten (10) years;
- (c) the matters in this litigation that each expert on which each expert is expected to opine;
- (d) the factual basis underlying each opinion; and,
- (e) the amount of compensation paid to each expert.
- (f) a list of all cases each expert has testified as an expert at trial or deposition in the last four years.

NOTE: Answering this Interrogatory does not absolve Plaintiff of the duty to provide expert disclosures in accordance with Fed. R. Civ. P. 26(a)(2), or pursuant to the Court's Scheduling Order.

ANSWER TO INTERROGATORY NO. 3: Plaintiff has not specifically retained an expert witness for purposes of testifying in this case. Plaintiff will supplement this information, should an expert be retained in this case.

INTERROGATORY NO. 4: Identify, by carrier, policy number, policy limits, and date(s) of coverage, any and all insurance policies that were in effect for the Property on March 25, 2020, regardless of whether such polic(ies) were purchased by you or anyone else and regardless of whether such polic(ies) are still in effect.

ANSWER TO INTERROGATORY NO. 4: Plaintiff does not know of any other policies insuring the property at the same time of Defendant's policy.

INTERROGATORY NO. 5: Provide the following information as to each type(s) or category of damage you seek to recover in this lawsuit:

- a. A detailed description of each and every injury, loss, cost, expense, or element of damage you claim to have sustained by reason of the allegations in your claims against Great Lakes.
- b. The dollar amount for each type of injury, loss, or element of damage you seek to recover. And,
- c. A complete description of the source or method/calculation you utilized in determining each of these damage amounts.

Fire Marshall, or any other municipal or state agency, since your purchase of the Property, to the present.

RESPONSE TO REQUEST FOR PRODUCTION NO. 28: See incident reports as produced.

Respectfully submitted,

MARTIN, JEAN & JACKSON

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CERTIFICATE OF MAILING

I hereby certify that on this 29th day of June 2022, a true and correct copy of the above and foregoing instrument was placed in the U S Mail with proper postage affixed thereto to the following:

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